

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

ORAL ARGUMENT REQUESTED

**PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT OF VALIDITY
BASED UPON *INTER PARTES* REVIEW ESTOPPEL
UNDER 35 U.S.C. § 315(e)(2)**

Pursuant to Fed. R. Civ. P. 56, plaintiff, Singular Computing LLC (“Singular”), hereby moves for partial summary judgment of validity based upon *inter partes* review estoppel under 35 U.S.C. § 315(e)(2). A supporting Memorandum of Law, Declaration of Kevin Gannon (with Exhibits A-Y) and Statement of Undisputed Material Facts are being filed concurrently herewith. For the reasons set forth therein, Singular requests that this motion be granted.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Singular requests the Court to entertain oral argument on this motion, as Singular believes such will assist the Court in resolving the motion.

Dated: November 3, 2022

Respectfully submitted,

/s/ Paul J. Hayes

Paul J. Hayes (BBO #227000)

Matthew D. Vella (BBO #660171)

Kevin Gannon (BBO #640931)

Brian Seeve (BBO#670455)

Daniel McGonagle (BBO #690084)

PRINCE LOBEL TYE LLP

One International Place, Suite 3700

Boston, MA 02110

Tel: (617) 456-8000

Email: phayes@princelobel.com

Email: mvella@princelobel.com

Email: kgannon@princelobel.com

Email: bseeve@princelobel.com

Email: dmcgonagle@princelobel.com

ATTORNEYS FOR THE PLAINTIFF

LOCAL RULE 7.1 CERTIFICATION

I, Kevin Gannon, counsel for Singular Computing LLC, hereby certify that, on November 2, 2022, I conferred with counsel for Google LLC to resolve the issues presented in this motion but, after a good faith attempt to reach agreement, the parties were unable to do so.

/s/ Kevin Gannon

CERTIFICATE OF SERVICE

I certify that on November 3, 2022, all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Paul J. Hayes